The dust action level of 7 ug/m3 proposed in the 2006 Response Plan, Appendix E - Air Monitoring Work Plan prepared by Advanced GeoEnvironmental, Inc., was derived using the highest PCB concentration (9,560 mg/kg) detected at the site prior to the Phase 1 cleanup. By comparison, the average (95% UCL) PCB concentration for the site was only 448 mg/kg, which was more representative of PCB levels that might be carried by dust during the Phase 1 cleanup. The dust action level derived using the highest PCB concentration was considered conservative for "*...indicating potentially elevated levels of PCBs*" so "*additional watering or other appropriate control measures will be implemented to reduce the level of dust generate.*" (Page 7 of the Air Monitoring Work Plan). Exceeding the dust action level was not indicative of elevated PCB levels in air, rather additional control measures should be considered to reduce dust levels.

Please note that actual PCB levels in air were measured by the PCB monitoring specified in Section 3.4 of the same Work Plan. No PCBs were detected in the air samples collected at the property boundary during Phase 1 and Phase 2 cleanup. The laboratory analytical results for these samples can be found on the DTSC Envirostor website:

Phase 1 air monitoring data: [HYPERLINK "http://www.envirostor.dtsc.ca.gov/regulators/deliverable_documents/2084416031/Ag%20Park%20Ph%201%20Impl%20Rpt%20-%20App%20D.pdf"]

Phase 2 air monitoring data: [HYPERLINK "http://www.envirostor.dtsc.ca.gov/regulators/deliverable_documents/7364622354/EMSL.pdf"]

It should be noted that the dust action level of 7 ug/m3 was proposed for Phase 1 cleanup, and not intended for the Phase 2 and upcoming Phase 3 cleanup where the remaining PCB concentrations were significantly lower. For example, the corresponding dust action level would be approximately 1,400 ug/m3 for Phase 2 cleanup based on the highest residual PCB concentration of 50 mg/kg after Phase 1 cleanup. All dust monitoring data collected during the Phase 2 cleanup were significantly below this threshold.